

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haeefe, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

April 9, 2024

The Honorable Sarah Netburn, U.S. Magistrate Judge
United States District Court for the S.D.N.Y.
Thurgood Marshall U.S. Courthouse, Room 430
40 Foley Square
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Plaintiffs respectfully write to request the Court's authorization for a minor additional four-day modification to the timing, and a specific order on the means of filing, of Plaintiffs' sur-reply in further opposition to the Kingdom of Saudi Arabia's motion to dismiss.

Saudi Arabia has advised that it does not object to the request for the four-day extension.

On March 12, 2024, this Court ordered Plaintiffs' sur-reply to be filed by April 15, 2024, ECF No. 9638. The intensive work of Plaintiffs' counsel to prepare their consolidated filings has since been disrupted by a series of professional conflicts and unforeseen personal setbacks. Counsel from each of the leading Plaintiffs' firms have been impacted, variously, by: scheduling at short notice of briefing and oral argument in two separate sets of proceedings before the Second Circuit; bereavement upon death of loved ones; family emergencies out-of-town; and unanticipated limitations on the availability of essential personnel due to travel, as well as holidays including Easter and Ramadan / Eid Al-Fitr. In light of these accumulated disruptions, Plaintiffs submit this unopposed request for an additional four days to file their sur-reply papers, until April 19, 2024.

Additionally, Plaintiffs respectfully request the Court's renewed approval to file Exhibits in support of Plaintiffs' filings with the Clerk of the Court under seal via a USB-enabled hard drive. The Court previously authorized Plaintiffs to file in this manner when submitting Exhibits to its Opposition, as well as its errata Exhibits, ECF Nos. 9479 and 9520.

Respectfully submitted,

COZEN O'CONNOR

MOTLEY RICE LLC

By: /s/ Sean P. Carter

By: /s/ Robert T. Haeefe

The Honorable Sarah Netburn
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cc: The Honorable George B. Daniels, via ECF
All Counsel of Record via ECF